

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-cr-348 (JNE/LIB)

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United States of America,

Plaintiff,

vs.

**DEFENDANT’S MOTION TO  
MODIFY CONDITIONS OF RELEASE**

Gale Allen Rachuy,

Defendant.

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Defendant Gale Allen Rachuy, by and through his attorney, hereby requests that the Court modify his conditions of his release to vacate the halfway house condition based on his continued compliance and change of circumstances, namely his worsening medical condition and his compliance of the halfway house’s rules to date.

1. The Order Setting Conditions of Release [Doc. 13] was entered on December 19, 2022.

One of the conditions of release was that Defendant “maintain residence at a halfway house or community corrections center, as the pretrial services office or supervising officer considers necessary, and observe the rules and regulations of that facility.” Order Setting Conditions, p.3(j).

2. Upon release from custody, Mr. Rachuy began residing at The Bethel halfway house in Duluth, Minnesota, and has remained there since his release.
3. Mr. Rachuy has a residence he can return to upon discharge from the halfway house. He requests vacating the halfway house condition and permission to return to a residence approved by Pretrial Services, with GPS monitoring.
4. AUSA Chelsea Walcker **opposes** this modification request.

5. Senior USPO Mathew Koppes **supports** this modification request. USPO Agent Koppes visited the proposed residence, has continuously supervised Mr. Rachuy while at The Bethel, and is also aware of Mr. Rachuy's medical concerns.
6. A proposed Order accompanies this motion.

Respectfully Submitted,

**Keyser Law, P.A.**

Dated: April 14, 2023

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